CDM

Memorandum

To: *Rebecca Thomas, EPA RPM*

From: *Nick Raines, CDM Libby Field Investigation Manager*

Date: *November 30, 2010*

Subject: *Operable Unit 2 Joint Site Inspection*

On November 3, 2010, the United States Environmental Protection Agency (EPA), Montana Department of Environmental Quality (MTDEQ), and CDM Federal Programs Corporation (CDM) conducted a joint site inspection of Operable Unit 2 (OU2) of the Libby Superfund Site. A joint site inspection is typically completed at the conclusion of construction at a given site and is required before an operational and functional determination can be made for the site. The purpose of this memorandum is to provide details on the joint site inspection and resulting action items.

The inspection was conducted on November 3, 2010. Meeting attendees included: Rebecca Thomas (EPA Remedial Project Manager [RPM]), Mike Cirian (EPA Onsite RPM), Libby Faulk (EPA Community Involvement Coordinator), Dick Sloan (MTDEQ), Paul Lammers (CDM Site Manager), and Nick Raines (CDM Investigation Manager).

During the inspection, meeting attendees observed current site conditions, reviewed previous remediation/restoration activities, and reviewed site figures indicating residual Libby Amphibole asbestos (LA) contamination that remains below existing grade. Restoration activities (seeding) were on-going during the inspection, within areas where remediation occurred during October 2010. These areas include a portion of Montana Highway 37 right-of-way, and a 100-foot by 100-foot area within the Flyway portion of OU2.

Inspection Findings and Resulting Action Items

Meeting attendees agreed that remediation activities were completed in accordance with the selected remedy outlined in the Record of Decision for OU2 (EPA 2010). However, several items require further attention to confirm this. As a result, the following action items were assigned:

1. Figure 2-3 of the Remedial Investigation Report for OU2 (CDM 2009) identifies four areas within the Parker property portion of OU2 where residual contamination may be found at less than 1 foot below ground surface. To confirm that a minimum of 12 inches of clean fill exists over any potential residual LA contamination, EPA and

MTDEQ representatives agreed that each of these areas should be sampled. EPA directed CDM to coordinate and conduct this sampling event as soon as possible.

2. The Remedial Investigation Report for OU2 (CDM 2009) indicates that residual LA contamination may be found at shallow depths, specifically within the vicinity of utility poles, guy wires, the edges of roadways, property boundary markers, state highway boundary markers, and National Forest property bounds. EPA directed CDM to revise Figure 2-3 to include areas where LA contamination may be found at shallow depths.

3. Figure 2-3 of the Remedial Investigation Report for OU2 (CDM 2009) indicates that residual LA contamination may be found at depths greater than 4 feet below ground surface over a large portion of the Parker property. Some of this area was excavated and restored with clean fill to a depth greater than 4 feet. EPA directed CDM to update the figure to identify areas where residual LA contamination may be found at depths greater than 5 feet below existing grade.

References

CDM. 2009. Final Remedial Investigation Report, The Former Screening Plant and Surrounding Properties, OU2, Libby, MT. May 2010.

EPA. 2010. Record of Decision for the Libby Asbestos Superfund Site, The Former Screening Plant and Surrounding Properties, OU2, Libby, MT. May 2010.

cc:

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Libby Project File